

EXHIBIT C

BUDGET AND STAFFING PLAN

EXHIBIT C-1

BUDGET (FEBRUARY 2023)

Period Covered: February 1, 2023 through February 28, 2023¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2023 through February 28, 2023
B110 Case Administration	30
B112 General Creditor Inquiries	5
B113 Pleadings Review	15
B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	5
B150 Meetings of Creditors' Committee and Communications with Creditors	20
B155 Court Hearings	40
B160 Employment / Fee Applications	50
B161 Budgeting (Case)	1
B165 Fee and Employment Applications of Other Professionals	15
B170 Fee and Employment Objections	2
B180 Avoidance Action Analysis	0
B185 Assumption / Rejection of Leases and Contracts	0
B190 Other Contested Matters	20
B191 General Litigation	50
B195 Non-Working Travel ²	0

¹ The proposed budget set forth herein is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative.

B210 Debtors' Financial Information and Operations/Fiscal Plan	5
B220 Employee Benefits/Pensions	5
B230 Financing / Cash Collections	0
B231 Security Document Analysis	0
B260 Meetings of and Communications with Debtors/Oversight Board	5
B261 Investigations	0
B310 Claims Administration and Objections	40
B320 Plan and Disclosure Statement	400
B420 Restructurings	200
TOTAL HOURS	908
TOTAL ESTIMATED FEES	\$1,094,140.00³
<i>MINUS 20% REDUCTION⁴</i>	<i>(\$218,828.00)</i>
TOTAL ESTIMATED FEES (NET OF REDUCTION)	\$875,312.00

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

³ The Total Estimated Fees are calculated based on a \$1,205 blended hourly rate for the Paul Hastings attorneys who are expected to work on this matter during the period from February 1, 2023 through February 28, 2023. The impact of the agreed-upon 20% end of the case write-off on the blended hourly rate cannot be calculated at this time. However, for illustrative purposes only, the blended hourly rate, after accounting for the 20% end-of-the-case reduction, would be approximately \$964.

⁴ For illustrative purposes only. Indeed, pursuant to the order authorizing the Committee's retention of Paul Hastings LLP [Docket No. 999], Paul Hastings can designate the precise fees to be waived to attain the 20% overall reduction in total fees in connection with the final fee application process. In other words, Paul Hastings could designate its entire final fee application as the source of this reduction (which it does not intend to do) or a combination of reductions across other fee applications (which is one more likely scenario).

BUDGET (MARCH 2023)

Period Covered: March 1, 2023 through March 31, 2023¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2023 through March 31, 2023
B110 Case Administration	30
B112 General Creditor Inquiries	5
B113 Pleadings Review	15
B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	5
B150 Meetings of Creditors' Committee and Communications with Creditors	20
B155 Court Hearings	40
B160 Employment / Fee Applications	50
B161 Budgeting (Case)	1
B165 Fee and Employment Applications of Other Professionals	15
B170 Fee and Employment Objections	2
B180 Avoidance Action Analysis	0
B185 Assumption / Rejection of Leases and Contracts	0
B190 Other Contested Matters	20
B191 General Litigation	50
B195 Non-Working Travel ²	0

¹ The proposed budget set forth herein is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative.

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B210 Debtors' Financial Information and Operations/Fiscal Plan	5
B220 Employee Benefits/Pensions	5
B230 Financing / Cash Collections	0
B231 Security Document Analysis	0
B260 Meetings of and Communications with Debtors/Oversight Board	5
B261 Investigations	0
B310 Claims Administration and Objections	40
B320 Plan and Disclosure Statement	500
B420 Restructurings	100
TOTAL HOURS	908
TOTAL ESTIMATED FEES	\$1,094,140.00³
MINUS 20% REDUCTION⁴	(\$218,828.00)
TOTAL ESTIMATED FEES (NET OF REDUCTION)	\$875,312.00

³ The Total Estimated Fees are calculated based on a \$1,205 blended hourly rate for the Paul Hastings attorneys who are expected to work on this matter during the period from March 1, 2023 through March 31, 2023. The impact of the agreed-upon 20% end of the case write-off on the blended hourly rate cannot be calculated at this time. However, for illustrative purposes only, the blended hourly rate, after accounting for the 20% end-of-the-case reduction, would be approximately \$964.

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BUDGET (APRIL 2023)

Period Covered: April 1, 2023 through April 30, 2023¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2023 through April 30, 2023
B110 Case Administration	30
B112 General Creditor Inquiries	5
B113 Pleadings Review	15
B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	5
B150 Meetings of Creditors' Committee and Communications with Creditors	20
B155 Court Hearings	40
B160 Employment / Fee Applications	50
B161 Budgeting (Case)	1
B165 Fee and Employment Applications of Other Professionals	15
B170 Fee and Employment Objections	2
B180 Avoidance Action Analysis	0
B185 Assumption / Rejection of Leases and Contracts	0
B190 Other Contested Matters	20
B191 General Litigation	50
B195 Non-Working Travel ²	0

¹ The proposed budget set forth herein is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative.

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B210 Debtors' Financial Information and Operations/Fiscal Plan	5
B220 Employee Benefits/Pensions	5
B230 Financing / Cash Collections	0
B231 Security Document Analysis	0
B260 Meetings of and Communications with Debtors/Oversight Board	5
B261 Investigations	0
B310 Claims Administration and Objections	40
B320 Plan and Disclosure Statement	500
B420 Restructurings	100
TOTAL HOURS	908
TOTAL ESTIMATED FEES	\$1,094,140.00³
<i>MINUS 20% REDUCTION⁴</i>	<i>(\$218,828.00)</i>
TOTAL ESTIMATED FEES (NET OF REDUCTION)	\$875,312.00

³ The Total Estimated Fees are calculated based on a \$1,205 blended hourly rate for the Paul Hastings attorneys who are expected to work on this matter during the period from April 1, 2023 through April 30, 2023. The impact of the agreed-upon 20% end of the case write-off on the blended hourly rate cannot be calculated at this time. However, for illustrative purposes only, the blended hourly rate, after accounting for the 20% end-of-the-case reduction, would be approximately \$964.

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BUDGET (MAY 2023)

Period Covered: May 1, 2023 through May 31, 2023¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2023 through May 31, 2023
B110 Case Administration	30
B112 General Creditor Inquiries	5
B113 Pleadings Review	15
B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	5
B150 Meetings of Creditors' Committee and Communications with Creditors	20
B155 Court Hearings	40
B160 Employment / Fee Applications	50
B161 Budgeting (Case)	1
B165 Fee and Employment Applications of Other Professionals	15
B170 Fee and Employment Objections	2
B180 Avoidance Action Analysis	0
B185 Assumption / Rejection of Leases and Contracts	0
B190 Other Contested Matters	20
B191 General Litigation	200
B195 Non-Working Travel ²	0

¹ The proposed budget set forth herein is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative.

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B210 Debtors' Financial Information and Operations/Fiscal Plan	5
B220 Employee Benefits/Pensions	5
B230 Financing / Cash Collections	0
B231 Security Document Analysis	0
B260 Meetings of and Communications with Debtors/Oversight Board	5
B261 Investigations	0
B310 Claims Administration and Objections	40
B320 Plan and Disclosure Statement	500
B420 Restructurings	100
TOTAL HOURS	1058
TOTAL ESTIMATED FEES	\$1,274,890.00³
MINUS 20% REDUCTION⁴	(\$254,978.00)
TOTAL ESTIMATED FEES (NET OF REDUCTION)	\$1,019,912.00

³ The Total Estimated Fees are calculated based on a \$1,205 blended hourly rate for the Paul Hastings attorneys who are expected to work on this matter during the period from May 1, 2023 through May 31, 2023. The impact of the agreed-upon 20% end of the case write-off on the blended hourly rate cannot be calculated at this time. However, for illustrative purposes only, the blended hourly rate, after accounting for the 20% end-of-the-case reduction, would be approximately \$964.

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EXHIBIT C-2

STAFFING PLAN (FEBRUARY 2023)

Period Covered: February 1, 2023 to February 28, 2023¹

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1, 2023 through February 28, 2023	Average hourly rate for period February 1, 2023 through February 28, 2023 (net of 20% reduction)²
Partner	7	\$1,737	\$1,390
Counsel	6	\$1,437	\$1,150
Associate	8	\$1,064	\$851
Paraprofessionals	5	\$350	\$280

¹ The proposed budget set forth herein is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative.

² The impact of the agreed-upon 20% end-of-the-case write-off on the average hourly rate cannot be calculated at this time. However, for illustrative purposes only, we have provided the average hourly rate, after accounting for the 20% end-of-the-case reduction.

STAFFING PLAN (MARCH 2023)

Period Covered: March 1, 2023 to March 31, 2023¹

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2023 through March 31, 2023	Average hourly rate for period March 1, 2023 through March 31, 2023 (net of 20% reduction)²
Partner	7	\$1,737	\$1,390
Counsel	6	\$1,437	\$1,150
Associate	8	\$1,064	\$851
Paraprofessionals	5	\$350	\$280

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STAFFING PLAN (APRIL 2023)

Period Covered: April 1, 2023 to April 30, 2023¹

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period April 1, 2023 through April 30, 2023	Average hourly rate for period April 1, 2023 through April 30, 2023 (net of 20% reduction)²
Partner	7	\$1,737	\$1,390
Counsel	6	\$1,437	\$1,150
Associate	8	\$1,064	\$851
Paraprofessionals	5	\$350	\$280

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STAFFING PLAN (MAY 2023)

Period Covered: May 1, 2023 to May 31, 2023¹

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period May 1, 2023 through May 31, 2023	Average hourly rate for period May 1, 2023 through May 31, 2023 (net of 20% reduction)²
Partner	8	\$1,737	\$1,390
Counsel	7	\$1,437	\$1,150
Associate	8	\$1,064	\$851
Paraprofessionals	6	\$350	\$280

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